

**EXHIBIT A**  
**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT COURT**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**ORDER GRANTING THE NAS CHILDREN AD HOC COMMITTEE’S MOTION  
ENTRY OF ORDER PURSUANT TO 11 U.S.C. §§ 105(A), 107(B) AND FED. R. BANKR.  
P. 9018 AUTHORIZING THE FILING OF CERTAIN INFORMATION AND EXHIBITS  
UNDER SEAL IN CONNECTION WITH THE NAS CHILDREN AD HOC  
COMMITTEE’S *EX PARTE* MOTION OF THE NAS CHILDREN AD HOC  
PREQUESTING A COURT ORDER AUTHORIZING EXAMINATIONS PURSUANT  
TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2004 AND 9006**

Pending before the Court is the “*the NAS Children Ad Hoc Committee’s Motion Entry of Order Pursuant to 11 U.S.C. §§ 105(A), 107(B) And Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain Information and Exhibits Under Seal in Connection with the NAS Children Ad Hoc Committee’s Ex Parte Motion of the NAS Children Ad Hoc Requesting a Court Oder Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006.*” (the “Motion

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

to Seal”) of the Ad Hoc Committee for NAS Children (the “Committee”) for entry of this order pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. 9018, authorizing the Committee to file under seal the “*Ex Parte Motion of the NAS Children Ad Hoc Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006*,”(the Motion) including the exhibits attached hereto, and declaration in support thereof, and to file a redacted version of such documents on the public docket of these cases, and for related relief as described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and the consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157)b; and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and no other or further notice of the Motion being required; and after due deliberation, the Court having determined that the legal and factual bases set forth in the Motion establish good and sufficient cause for the relief granted herein, in that the proposed redacted information constitutes confidential information properly protected under the Second Amended Protective Order (ECF 1540); the determination that there would be no prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the documents or any part thereof to grant this motion, and such relief being in the best interest of all parties in interest, it is hereby **ORDERED** that:

1. The Ad Hoc Committee of NAS Children’s Motion is granted as set forth herein.
2. The Committee is authorized and empowered to take all actions necessary to implement the relief granted in this order.
3. The Ad Hoc Committee of NAS Children shall file its unredacted Motion and exhibits under seal, in accordance with the procedures outlined in the Protective Order [ECF 1540].

4. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Bankruptcy Rule 9018-1, the Committee is authorized to file to the public docket of these cases the redacted Motion and exhibits thereto, as set forth in the versions submitted to the Court in connection with the Motion (the “Redacted Documents.”).

5. Entry of this Order is without prejudice to the rights of any party in interest in the Chapter 11 Cases or the U.S. Trustee to seek an order of this Court unsealing all or part of the redacted documents or sealed documents.

6. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: February \_\_\_\_, 2021  
White Plains, NY

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**THE HONORABLE ROBERT D. DRAIN**  
**UNITED STATES BANKRUPTCY JUDGE**